

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

NATIONAL URBAN LEAGUE, on behalf of
itself and its members; COMMON CAUSE,
on behalf of itself and its members; LEAGUE
OF WOMEN VOTERS OF THE UNITED
STATES, on behalf of itself and its members,

Plaintiffs,

vs.

LOUIS DEJOY, in his official capacity as
Postmaster General; and the UNITED
STATES POSTAL SERVICE,

Defendants.

No. 1:20-cv-2391

**PLAINTIFFS' FIRST SET OF
REQUESTS FOR PRODUCTION OF
DOUMENTS TO DEFENDANTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiffs request that Defendants Louis DeJoy and the United States Postal Service (collectively, "Defendants") produce for inspection, copying, reproduction, photographing, testing, or sampling the following specified documents or other tangible things in Defendants' possession, custody, or control. Production of all such documents and other tangible things shall be made by two business days prior to the Rule 30(b)(6) deposition of the United States Postal Service, and otherwise in accordance with Rule 34 of the Federal Rules of Civil Procedure, at the offices of Arnold & Porter Kaye Scholer LLP, 601 Massachusetts Avenue, Washington DC 20001.

INSTRUCTIONS

The following instructions shall apply to this First Set of Requests for Production of Documents ("Requests"):

1. In responding to these Requests, You shall furnish all responsive Documents in Your possession, custody, or control.

2. For any Document You withhold under a claim of privilege, please provide a log containing the following information: date; sender; recipient; type (*e.g.*, letter, memorandum, chart, etc.); subject matter; the basis on which privilege is claimed (*e.g.*, attorney/client privilege, work product, etc.); and the request number to which the Document would be responsive.

3. Where appropriate, each singular word shall include its plural and each plural word shall include its singular. The words “any,” “and,” and “or” shall be construed either disjunctively or conjunctively as necessary to require production of all Documents that might otherwise be outside the scope of discovery. The following words include the meaning of every other word: “each,” “every,” “all,” and “any.” The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.

4. Unless otherwise specified, the timeframe for all requests extends to the present.

5. This discovery is continuing in nature, and You are obligated to supplement the response to any request promptly after receiving, discovering, or obtaining any further responsive Documents.

DEFINITIONS

The following definitions shall apply to these Requests:

1. “Communication(s)” refers to any meeting, conference, conversation, memorandum, contact, act, or instance of transmitting or receiving information or intelligence by any means, directly or through another person, including but not limited to all forms of oral or written communication and the preparation, furnishing, receipt, examination, or copying of Documents or permitting others to do so.

2. “Document(s)” has the same meaning as “Documents or Electronically Stored Information,” as used for in Rule 34(a)(1) of the Federal Rules of Civil Procedure, and includes within its scope any “thing” or “things,” which also have the same meaning as used in Rule 34(a)(1) of the Federal Rules of Civil Procedure.

3. “Complaint” refers to the Complaint filed in this litigation.

4. “Person” refers to any natural person, association, partnership, joint venture, corporation, trust, and governmental, business, or professional entity.

5. “Relate to,” “related to,” or “relating to” means not only the Document which constitutes or contains the subject matter, but also any other Document recording, summarizing, digesting, referring to, commenting on, describing, listing, analyzing, studying, or otherwise discussing in any way the subject matter addressed by the request.

6. “You and “Your” refer to Defendants Louis DeJoy and the United States Postal Service, as well as all Persons acting on their behalf or behalves, including their agents, representatives, and attorney.

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Any Documents reflecting, containing, or describing policies, guidance, or written practices related to the subjects identified in topics 1 through 12 of the Notice of Deposition issued pursuant to Rule 30(b)(6) contemporaneously with these Requests.

2. Any Documents and Communications constituting, evidencing, or referring to the communications described in topics 13 and 14 of the Notice of Deposition issued pursuant to Rule 30(b)(6) contemporaneously with these Requests.

3. All Documents provided to any of the plaintiffs in any of the following actions:

(a) *Washington v. Trump*, No. 1:20-cv-03127 (E.D. Wash.)

- (b) *Jones v. United States Postal Service*, 1:20-cv-06516 (S.D.N.Y.)
- (c) *Richardson v. Trump*, 1:20-cv-02262 (D.D.C.)
- (d) *NAACP v. United States Postal Service*, No. 1:20-cv-2295 (D.D.C.)
- (e) *New York v. Trump*, No. 1:20-cv-02340 (D.D.C.)
- (f) *Johnakin v. United States Postal Service*, No. 2:20-cv-04055 (E.D. Pa.)
- (g) *Pennsylvania v. DeJoy*, No. 2:20-cv-4096 (E.D. Pa.)

Dated: August 26, 2020

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Respectfully submitted,

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* *Pro hac vice*

** *Pro hac vice* application forthcoming